

Comments on EPA's Proposal
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Polling of members from the STS Westchester / Putnam New York Chapter indicates that most of them work on the following 16 vehicle types: GM, Ford, Chrysler, Toyota, Honda, Nissan, Mazda, Subaru, Mitsubishi, Hyundai, VW, Audi, Acura, Lexus, Infinity, Saturn.

Since industry estimates indicate that 80% of the vehicle service is done by aftermarket technicians we suggest the following.

Suggestions:

Website

1. Uniform & Consistent search engine for all OEM's
2. Search by VIN #
3. Search by vehicle system
4. Search by generic OBD II part name
5. Search by P0 & P1 codes

Access to OEM Websites: 24 hour access, 30 day access, 365 day access.

Concerns:

1. Is this complete access for all information from the manufacturer?
2. Does it cover all of the manufacturers' vehicles?
3. Does it cover all vehicle years from 1996 to present?
4. Does it cover all vehicle emissions-related information?
5. Does this include all of the OEM badge names?
Example GM – Saab; Ford – Volvo; Daimler Chrysler – MB.

We Suggest in addition to the OEM's websites a central website. Access to numerous OEM websites may be confusing and time consuming. We would like to see one central portal that technicians can go to with drop down menus.

1. We suggest that STS be this source. Reasons include:
 - o STS would be able to gather information from technicians who encounter problems or incomplete information from a website.
 - o User information collected by STS can be evaluated and transferred to EPA.
 - o We believe that this would be a much better way of protecting both the aftermarket technicians and the OEM's from unfounded complaints.
 - o STS has a body of professional technicians, shop owners, educators and access to the engineering community through their affiliation with SAE.

Suggestions on Scan tools and Reprogramming

1. Scan tool interfaces should be standardized, showing *at least* the following on the main screen: PIDS, DTC / Freeze Frame and Monitors.
2. Scan tools should use the same word when a monitor is finished running.
Complete / Done / Ready / Yes
3. Reprogramming is essential in repairing OBD II failures. We need access to reprogramming from all aftermarket tools at a reasonable cost. This will prevent the ping-pong for the consumer and repair facilities. Standardized reprogramming procedures and interfaces for pass-through and off-car to eliminate the need to purchase and then constantly upgrade multiple interfaces.
4. Concerns about different communication such as VPM, PWM, ISO, KWP and CAN.

Other Concerns:

1. VIN- Specific Drive cycle definitions need to be available for all vehicles.
2. Recalls, internal campaigns, voluntary recalls need to be available at the same time they are given to OEM dealer network.
3. System Logic, including monitor strategies, related components used by each monitor and range/response times for sensor inputs need to be made available to technicians.
4. Parameters (known good pin outs voltage / amperage charts) for all sensors and actuators.
5. OEMs that do not have information available in electronic format should make their information available by fax. We would like to see these OEMs convert their non-electronic format into a standardized electronic format.

Training

We need access to training material at prices comparable to other aftermarket training material. We propose that training material be provided to organizations such as CAAT and ATMC for distribution and verification.

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To Holly Puggleise and the EPA staff charged with OBD II compliance; Following are my observations and comments regarding the proposed rulemaking 40CFR Part 86 for control of motor vehicle pollution. My point of view is as a BMW only specialist who has spent the last decade opposing and sometimes crippled by BMW's anti competitive, and sometimes illegal trade practices.

1. I think that all information that is currently available on CD ROM or other easily duplicable media, that is not on the web sites, should continue to be made available for sale or put into the public domain (maybe donated to IATN or STS?) once the OEM's stop supplying it. This information should not have any type of time or use limiting software to defeat its utility. Hi speed Internet access isn't available everywhere so a second reliable channel needs to exist.
2. The specific as well as generic drive cycle information should be released, as it's critical to resetting monitors and confirming repairs.
3. Penalties should be much higher (triple indemnity clause or a 30 day halt in their ability to sell cars?) for manufacturers that show a chronic and organized disregard for the regulations as BMW has in the past to discourage them from continued unlawful and anti-competitive practices.
4. On page 19, last paragraph training materials are mentioned. Language should be included to guaranty that all training information is available. Most OEM training courses have useful information that is not in the book. Transcripts of actual course lessons should be included, especially since this could be a loophole for some manufacturers to use evading the intent of the law. This is addressed on page 21 , but should be mandatory unless the course material exactly matches the actual course presentation.
5. In the interim before independent repair facilities have full diagnostic and reprogramming capability, the OEM dealers should be required to supply those services within a reasonable time, say two days or face some type of sanction.

In closing, I would like to say that the proposed rulemaking appears to be well thought out and to clearly express the intention, and the methods for complying with the law.

Pierre Respaut